

**STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF WATER RESOURCES**

Small Municipal Separate Storm Sewer System (MS4) Audit Worksheet *

MS4 Name: <u>Morristown</u>	Date: <u>5/5/14</u>
County: <u>Hamblen</u>	Permit #: <u>TNS0 76031</u>
Responsible Official:	NOC Date: <u>6/15/11</u>
On-Site Representative(s): <u>Jim Whitbeck</u> Phone Number(s):	
Name/Address/Title/Phone Number of MS4 Contact Person:	

Y=Yes N= No (Circle one)

Stormwater Management Program (NPDES Permit Section 4.1.)

1. ☒ Y ☐ N Has a written Stormwater Management Plan (SWMP) been developed? (4.1.)

Minimum Control Measure #1: Public Education and Outreach (4.2.1)

2. ☒ Y ☐ N Has this program element been included in the SWMP? (4.2.1)
3. ☒ Y ☐ N Have they implemented a public education and outreach program? (4.2.1)
4. ☒ Y ☐ N Have they identified "hot spots" within their jurisdiction? (4.2.1)

If yes, list specific events/activities focused on "hot spot" areas and the pollutant(s) of concern.

brochure/mailings twice
newspaper articles

[Hot spot means an area where land use or activities generate highly contaminated runoff, with concentrations of pollutants in excess of those typically found in stormwater. Examples might include operations producing concrete or asphalt, auto repair shops, auto supply shops, large commercial parking areas and restaurants. (permit definition)]

5. ☒ Y ☐ N Have they developed a written Public Information and Education Plan (PIE)?
(Due 12 months from NOC effective date) (4.2.1.)
6. ☒ Y ☐ N Has a method to evaluate the plan's effectiveness been incorporated into the PIE?
(4.2.1.)
7. ☒ Y ☐ N Does the PIE detail specific goals and specific public information events/activities that will occur over the remainder of the permit cycle? (4.2.1.)

6/11 - 6/12 1
6/12 - 6/13 2
6/13 - 6/14 3
6/14 - 6/15 4
6/15 - 10/15 5

8. Does the PIE include targeted educational campaigns addressing the following issues (4.2.1.):

☒ Y ☐ N General public awareness on the impacts on water quality from general housekeeping maintenance/activities? *newspaper*

☒ Y ☐ N Home owner associations and other operators of permanent BMPs awareness of the importance of maintenance activities?

☒ Y ☐ N Local engineering and development community awareness of the stormwater ordinances, regulations, and guidance materials related to long-term water quality impacts?

☒ Y ☐ N General public and professional chemical applicators awareness on the proper storage, use, and disposal of pesticides, herbicides, and fertilizers?

☒ Y ☐ N General public and professional chemical applicators awareness on the proper storage, use, and disposal of oil and other automotive-related fluids?

☒ Y ☐ N General public and municipal employees on the awareness of identifying and reporting procedures for illicit connections/discharges, sanitary sewer seepage, spills, etc.? *50/300*

☒ Y ☐ N Local engineering, development, and construction community awareness of stormwater ordinances, regulations and guidance materials related to construction phase water quality impacts?

☒ Y ☐ N Municipal employee/contractor awareness of water quality impacts from daily operations?

9. ☒ Y ☐ N Do they track and maintain records of these activities? (4.2.1.)

Minimum Control Measure #2: Public Involvement/Participation (4.2.2)

10. ☒ Y ☐ N Has this program element been included in the SWMP? (4.1.)

11. ☒ Y ☐ N Have they complied with public notice requirements? (4.2.2) [i.e., A public notice would normally be required when the local government proposes to enact a stormwater management ordinance, changes to ordinance, etc.]

If yes, what method(s) of advertising are they using?

12. ☒ Y ☐ N Have they identified and published the name of the stormwater contact?

Where is this information located?

www.mymorrisstown.com/stormwater

13. ☒ Y ☐ N Have they created a website devoted to their stormwater program?

Internet (Identify website): my morristown.com/stormwater

14. How do they ensure public participation and involvement during the stormwater management program development process and/or during program changes? (i.e. stormwater advisory groups) yes

15. How do they encourage citizen reporting of illegal spillage, dumping or illicit disposal of materials into the MS4 system? (i.e. hotlines, website link) (4.2.2.)

brochures & newspaper

16. How was the annual report presented (i.e., public meeting, posted on the internet, etc.) (5.4.)

public meeting

17. ☒ Y ☐ N Are stormwater related volunteer activities sponsored or endorsed by the MS4?

HHW

KMHB lake clean up

indirectly

What participatory/stewardship activities (i.e. waterbody cleanups, storm drain stenciling, etc.) did they implement?

What is their method of advertising the public involvement opportunities?

(Due within 30 days of NOC effective date) (4.2.2)

Newspaper & Website

18. ☒ Y ☐ N Have they tracked and maintained records of all public involvement/participation programs and activities? (4.2.2.) List how.

List the activities and number of the people that participated? (Including annual report meeting, cleanups, etc.)

Minimum Control Measure #3: Illicit Discharge Detection and Elimination (IDDE) (4.2.3)

The objective of the illicit discharge detection and elimination minimum control measure is to have regulated small MS4 operators gain a thorough awareness of their system. This awareness allows them to determine the types and sources of illicit discharges entering their system; and establish the legal, technical, and educational means needed to eliminate these discharges. (EPA Fact Sheet 2.5) [In other words, it is more than just a spill response program.]

19. ☒ Y ☐ N Has this program element been included in the SWMP? (4.1.)

20. ☒ Y ☐ N Have they maintained, either through ordinances or other regulatory mechanisms, the ability to prohibit non-stormwater discharges into their storm sewer system? (4.2.3)
21. ☒ Y ☐ N Have they continued to develop and implement an illicit discharge detection and elimination program (IDDE) to detect and address non-stormwater discharges, including illegal dumping into their system? (4.2.3)
22. ☒ Y ☐ N Have they continued to update, and develop a storm sewer system map showing the location of all outfalls and the identification/name of receiving waters? (4.2.3)
23. ☐ Y ☐ N Does the map also include inputs into the storm sewer collection system and indicate the general direction of stormwater flow? (4.2.3.)

Who can access the map and for what purpose? *internal only*

24. ☐ Y ☒ N Have they developed written procedures for conducting the IDDE program? (4.2.3.)
25. ☒ Y ☐ N Has a written Enforcement Response Plan (ERP) for illicit discharges been developed? (Due 18 months from NOC effective date) (4.2.3.)
26. ☒ Y ☐ N Has the Enforcement Response Plan (ERP) been implemented? (Due 18 months from NOC effective date) (4.2.3.)
27. ☐ Y ☒ N Is dry weather/field screening conducted? *preliminary*
28. ☐ Y ☒ N Based on field screenings have they identified areas that have a reasonable potential of having illicit discharges? (4.2.3.)
29. What is the frequency of their field screenings?
30. ☒ Y ☐ N Are investigations of illicit discharges documented? (4.2.3.)

Does the documentation contain:

☐ Y ☐ N locations
☐ Y ☐ N times
☐ Y ☐ N parameters

☐ Y ☐ N sample results
☐ Y ☐ N discovered source

31. ☒ Y ☐ N Have they prohibited, by ordinance or other regulatory mechanism, contamination of stormwater from hot spots? (4.2.3)

32. ☒ Y ☐ N Is a mechanism currently available to the public to report illicit discharges (hotline, website, other)? (4.2.3.)

What is that mechanism? *both*

33. What are the illicit complaint investigation procedures? *Good document*

34. ☒ Y ☐ N Does the ERP specify a timeframe for complaint investigations? (4.2.3.)

35. ☒ Y ☐ N Have they responded to complaints within 7 days? (4.2.3.)

How many illicit discharges have been reported during this review period? *4*

How many illicit discharges have been responded to during this review period? *4*

How many illicit discharges have been eliminated during this review period? *4*

? How many illicit discharges have been documented during this review period?

36. Who is responsible for reporting/informing a hazardous waste or material spill and cleanup activities to TEMA and/or local spill response agencies? *911 → TEMA → Mo-town*

37. ☐ Y ☐ N Is a set of written guidelines and procedures in place for responders to follow in case of a hazardous waste or material spill? (4.2.3.) Request a copy. *yes - police order 500.28-6*

38. ☐ Y ☐ N Is a training/education program in place to inform the following groups of the hazards associated with illegal discharges and improper disposal of waste (4.2.3):

☒ Y ☐ N MS4 Employees (public employees)?

Spill Prevention & Response:

IDDE Procedures (response, investigation, elimination, prevention):

☐ Y ☒ N Industry/Commercial (businesses)?

Hazards of illegal dumping & illicit discharges:

☒ Y ☐ N General Public?

Hazards of illegal dumping & illicit discharges:

Used oil & household hazardous waste educational materials:

Recycling & disposal facilities:

IDDE reporting procedures:

☐ Y ☐ N Other:

39. What types of enforcement mechanisms are available? (Due 18 months from NOC effective date) (4.5.1.a, b., c., d., f.)

- ☒ Y ☐ N Verbal warnings
- ☒ Y ☐ N Written notices
- ☒ Y ☐ N Citations w/ administrative penalties
- ☒ Y ☐ N Stop work orders
- ☐ Y ☒ N Withholding of plans or other authorizations
- ☐ Y ☐ N Additional measures (list)

40. ☒ Y ☐ N Have any enforcement actions been taken during this review period? **4**

Describe:

41. ☒ Y ☐ N Is there an official enforcement escalation plan or procedure in place? Request a copy. (4.5.1.)

Minimum Control Measure #4: Construction Site Stormwater Runoff Control (4.2.4)

42. ☒ Y ☐ N Has this program element been included in the SWMP? (4.1.)

43. ☒ Y ☐ N Have they continued to develop and implement a program to reduce pollutants in any stormwater runoff to the MS4 from construction activities that result in a land disturbance of greater than or equal to one acre and/or less than one acre if that construction activity is part of a larger common plan of development? (Due 24 months from NOC effective date) (4.2.4)

44. ☒ Y ☐ N Have they updated ordinances or other regulatory mechanisms to include the current erosion prevention and sediment control (EPSC) measure requirements? What dates were these ordinances or regulatory mechanisms adopted? Date adopted: 3/15/11
(Due 18 months from NOC effective date) (4.2.4a)

Ordinance No. 3411 section 18-605
Name and/or code section(s):

45. ☒ Y ☐ N Have they developed sanctions to ensure compliance with these ordinances and regulatory mechanisms? (4.2.4a) *appeal board is "municipality's governing body" (not BZA?)*

☒ Y ☐ N Do the sanctions include monetary penalties as specified in TCA 68-221-1106? (4.2.4a)

46. ☒ Y ☐ N Are their EPSC requirements consistent with those described in the TDEC EPSC Handbook? (4.2.4b)

47. ☒ Y ☐ N Have they updated requirements in their program corresponding to the Tennessee Construction General Permit? Including special conditions for impaired and exceptional waters? (Due 18 months from NOC effective date) (4.2.4c)

48. ☒ Y ☐ N Have they developed an inventory and tracking mechanism for all active public and private construction sites that result in a land disturbance of greater than or equal to one acre and/or less than one acre if that construction activity is part of a larger common plan of development? (4.2.4d) What is the mechanism? Ask to see it. *Energov*

Cat

needs insp date tracking

49. ☒ Y ☐ N Have they developed requirements for construction site operators to control wastes such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impacts to water quality? (4.2.4e)

50. ☒ Y ☐ N Have they developed procedures for site plan review, which incorporate consideration of potential water quality impacts? (4.2.4f)

Are those procedures in writing? Request a copy. ✓

51. ☒ Y ☐ N Are these procedures included in the SWMP?

☒ Y ☐ N Does the procedures include an evaluation of plan completeness and over all BMP effectiveness? (4.2.4.f.)

52. How many plans were reviewed during this reporting period?

14

53. ☒ Y ☐ N Does the plan review process ensure that EPSC measures meet state technical standards?

54. ☒ Y ☐ N Have they developed procedures for receipt and consideration of information submitted by the public? List the procedures.(4.2.4g) *website*

55. ☒ Y ☐ N Have they developed procedures for site inspection and enforcement of control measures? (4.2.4h) *Inspection*

56. ☒ Y ☐ N Are the enforcement steps included in their ERP? (4.2.4.h.)

57. ☒ Y ☐ N Have they required their inspectors to complete and maintain certification under the Tennessee Fundamentals of Erosion Prevention and Sediment Control, Level 1(or equivalent)? (4.2.4.i) List inspector names. ~~Personnel~~

Level I

SMU

58. ☒ Y ☐ N Have they required their site plan reviewers to complete and maintain certification under the Tennessee Erosion Prevention and Sediment Control Design Course, Level 2? (4.2.4i)
List plan reviewer names.
59. ☒ Y ☐ N Do they identify priority construction activity (a.k.a., sites)? (4.2.4.j) How?
60. ☒ Y ☐ N Do they hold pre-construction meetings with construction site operators for priority construction activities? (4.2.4.j.) *everybody*
61. ☒ Y ☐ N Do they perform inspections of priority construction sites at least once per month? (4.2.4.j.) *personnel problems in 1Q14, but help on way* *all sites monthly*
62. ☒ Y ☐ N Is a standardized inspection form used? (request a copy)
63. How many construction sites have active permits with the MS4? *14*
64. What is the number of active construction sites requiring monthly inspections? *14*
65. What is the number of inspections performed and the frequency over the past 12 months? *mo/active*
66. Request to see the procedures for tracking inspections. Describe the procedures.
paper files adequate
67. How many violations were found in the previous year? *2*
68. What are the procedures if violations are found? Are the procedures documented in the ERP? (4.5.1.) *yes*
69. What is the procedure when citizen complaints are received? *✓*
70. ☒ Y ☐ N Can construction site inspectors administer enforcement actions?
If no, who can?
If yes, what types of enforcement actions? *verbal warnings & NOVs*
NOVs and up, receive supervisor approval.
71. ☐ Y ☐ N Are enforcement actions tracked? Ask to see their tracking mechanism.
paper files & with case workers

72. Describe this tracking mechanism and person(s) responsible for follow up.

individual inspectors

73. How many of the following enforcement actions were used in the previous year?

Notices of Violations (NOV) 2

Administrative fines 0

Stop-work orders 0

Civil penalties 0

Criminal penalties 0

74. What is the most common compliance issue on construction projects (i.e. tracking on streets, litter or inadequate concrete washout BMPs)?

mud in streets
BMP failure, re-routing drainage patterns

Minimum Control Measure #5: Permanent Stormwater Management in New Development and Redevelopment (4.2.5)

75. ☒ Y ☐ N Has this program element been included in the SWMP? (4.1.)
76. ☒ Y ☐ N Have they developed and implemented a program to address post-construction runoff from new development and redevelopment projects which disturb an acre or more or are part of a larger common plan? (4.2.5.1)
77. ☒ Y ☐ N Have they developed and implemented ordinances or other regulatory mechanisms to address post-construction runoff from new development and redevelopment projects? (4.2.5.1)
78. ☒ Y ☐ N Have they developed sanctions to ensure compliance with these ordinances and regulatory mechanisms? (4.2.5.1.)
- ☒ Y ☐ N Do the sanctions include monetary penalties as specified in TCA 68-221-1106? (4.2.4a)
79. ☐ Y ☒ N Have they developed a set of requirements (performance standards) to establish, protect, and maintain water quality buffers in areas of new development and redevelopment? (4.2.5.1)
- ☐ Y ☒ N In areas less than 1 mile² the buffer equals 30 feet
- ☐ Y ☒ N In areas greater than 1 mile² the buffer equals 60 feet

What document and section is this requirement in? Ask for a copy.

Performance Standards (4.2.5.2.)

80. ☒ N Do site design standards require that BMP's be designed, built and maintained to infiltrate, evapotranspire, harvest, or use, at a minimum, 100% of the first inch of every rainfall event preceded by 72 hours of no precipitation? (4.2.5.2.1)

81. If a site cannot meet the 100% runoff reduction requirement, what other options are they utilizing? (circle one) *NA*

Pollutant Removal

Off-site Mitigation

Public Stormwater Project Fund

82. ☒ N Do they offer an incentive program for redeveloped sites? (4.2.5.2.1)

Codes and Ordinances Review and Update (4.2.5.3.)

83. ☒ N Have they filled out the EPA Water Quality Control Scorecard within the first year of coverage? (4.2.5.3.)

84. ☒ N Did they submit a copy of the scorecard with the subsequent annual report? (4.2.5.3.)

85. ☒ Y ☒ N Have any changes been made to local codes and ordinances? (4.2.5.3.)

What were the changes?

86. ☒ Y ☒ N Were the required updates to the ordinances performed within 4 years of coverage under this permit? (4.2.5.3.) List deadline date. *6/15/15*

NA

Development Project Plan Review, Approval and Enforcement (4.2.5.4)

87. ☒ N Have they included project review, approval and enforcement procedures in the ERP? (4.2.5.4.)

88. Do the procedures include the following: *WQMP*

☒ Y ☒ N procedures for site plan review and approval that include inter-departmental consultations (4.2.5.4.a.) *Bond release, and final platting*

☒ Y ☒ N how the site plan review ensures that performance standards are met and how long-term maintenance is addressed (4.2.5.4.b.) *template maintenance*

☒ Y ☒ N A verification process and enforceable procedures to ensure that permanent stormwater BMPs have been installed correctly (4.2.5.4.c.)

as built's required¹⁰ but not all incorporated

need more inter action

89. Who performs post construction BMP plan review? *Jim Whitbeck*

90. ☒ Y ☐ N Have they adopted a post construction design manual? Ask to see a copy.

JC / Bristol / Elizabethton manual

BMP Maintenance (4.2.5.5)

91. ☒ Y ☐ N Have they required the operator at permitted sites to develop and implement a maintenance agreement accepting maintenance responsibility and allowing for inspections and also account for transfer of lease/deed responsibility? (4.2.5.5, 4.2.5.5.1)

92. ☒ Y ☐ N Have they developed and implemented regulatory mechanisms to ensure adequate long-term operation and maintenance of BMPs? (4.2.5.5) *hand release good*

93. ☐ Y ☒ N Do they ensure this maintenance agreement includes a provision requiring BMP owners to initiate corrective action within 30 days of receiving a non-compliance notification? (4.2.5.5)

94. ☒ Y ☐ N Does the maintenance agreement allow for them, or their designees, to perform necessary maintenance neglected by the owner/operator and bill/recoup all costs incurred by the MS4 for these corrections? (4.2.5.5) *Easement issues persist*

Inventory and Tracking of Management Practices (4.2.5.6)

95. ☒ Y ☐ N Have they developed a system to track BMP's at new development and redevelopment sites? (Due 180 days from NOC date) (4.2.5.6.)

96. In addition to standard information (project name, owner, location, start/end dates), do they require the following information for the BMP tracking system (4.2.5.6.a., b., c., d.):

☒ Y ☐ N BMP description (type, number, specifications)

☒ Y ☐ N Lat/Long coordinates

☒ Y ☐ N Maintenance requirements

☒ Y ☐ N Inspection information (date, findings, follow up activities, compliance status)

Owner/Operator Inspections (4.2.5.7)

97. Y ☒ N Are they requiring owner/operators to perform routine inspections of all BMP's at least annually? (4.2.5.7.a.)
98. Y ☒ N Are they requiring owner/operators to perform comprehensive inspections of all stormwater management facilities at least every five years? (4.2.5.7.b.)
99. Y N Are these inspections (1/5yrs) being performed by an engineer or landscape architect? (4.2.5.7.b.) *NA*
100. Do the inspection reports include the following information (4.2.5.7.b.):
- | | | | |
|---|------------------------------------|--|-----------|
| Y | <input checked="" type="radio"/> N | Facility type | <i>NA</i> |
| Y | <input checked="" type="radio"/> N | Inspection date | |
| Y | <input checked="" type="radio"/> N | BMP owner information | |
| Y | <input checked="" type="radio"/> N | Description of BMP condition | |
| Y | <input checked="" type="radio"/> N | Photos | |
| Y | <input checked="" type="radio"/> N | Maintenance items or violations needing correction | |
101. Y ☒ N Are they requiring a copy of these inspections to be submitted?

Minimum Control Measure #6: Pollution Prevention/Good Housekeeping for Municipal Operations (4.2.6)

MS4 Operation/Maintenance Activities

102. ☒ Y N Has this program element been included in the SWMP? (4.1.)
103. ☒ Y ☒ N Have they identified the municipal activities that are exposed to stormwater? List the activity and/or facility. (i.e., park, open space maintenance, fleet and building maintenance, construction/land disturbances, and stormwater system maintenance). *need inventory*
104. ☒ Y N Is there a designated stormwater person identified for each activity/facility?
105. ☒ Y N Have they developed and implemented an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations? (4.2.6.)

106. ☒ Y ☐ N Is there stormwater BMP technical guidance designated and made available for maintenance staff?

107. What types of training have been received? *ppt from Jim to all staff @ sites w/ O&M*

108. How many of the staff have received training? (List by facility)

<i>PW</i>	<i>PR</i>	<i>BG</i>
<i>100%</i>	<i>100%</i>	<i>95%</i>

109. ☐ Y ☒ N Do they use contractual staff to complete MS4 maintenance activities?

If ☒ yes who? *TLC* *→ contractors do not get training.*

110. ☐ Y ☒ N Is there a schedule established for inspection and cleaning of catch basins and the stormwater conveyance system? What is the schedule? *weekly trash bi-weekly brush* *1/5 wk str & sub*

111. What is the frequency of inspection? (Proactive/Response to emergencies)

Proactive

112. ☐ Y ☒ N Are procedures in place for properly disposing of waste removed from the separate storm sewers? (4.2.6.) *yes in PW SWPPP*

113. How is the MS4 spoil disposed of? Is it tracked and recorded? Ask to see documentation.

landfill records are city-wide in scope, and MS4 spoil

114. How often does street sweeping occur?

1/5 wk

not individually tracked

115. How are the street sweeping spoils disposed?

same as before *→*

116. ☐ Y ☒ N Is there a written Integrated Pest Management (IPM) program for municipal operations? If yes, who is assigned to coordinate the IPM program?

sub contractor needs Ed pamphlet

117. How does the SWMP address/inspect road salt storage?

no exposure, has ~~SWPPP~~ SWPPP

118. ☐ Y ☒ N Are storage locations identified for chemicals? *PW SWPPP lacks map*

narrative description included

119. ☐ Y ☒ N Are there procedures for chemical (i.e., deicer, brine, etc.) applications?

120. ☐ Y ☒ N Do maintenance contracts include language on stormwater impact and appropriate BMPs?

121. Y ☒ N *NA* Are procedures in place to ensure that new flood management projects assess the impacts on water quality? [Have they coordinated with flood control managers for the purpose of identifying and addressing environmental impacts?] (4.2.6.)
122. ☒ Y N Are procedures in place to examine existing projects for incorporating additional water quality protection devices or practices at municipal facilities? (4.2.6.)
CIP plan in place
123. ☒ Y N Have the following been considered when developing their program:
maintenance activities, maintenance schedules, long-term inspection procedures of structural and non-structural controls, controls for reducing or eliminating discharges from streets, roads, highways, municipal parking lots, maintenance and storage yards, fleet or maintenance shops, salt/sand storage locations, and waste transfer stations. (4.2.6.)

Reviewing and Updating Stormwater Management Program (4.4.)

124. ☒ Y N Are they performing an annual review of the Stormwater Management Program during preparation of the annual report? (4.4.1) List how this is done?
125. ☒ Y N Are changes to the Stormwater Management Program being reported to the division? (4.4.2) *no major changes*
How are the changes reported? *Annual Reports*
126. Y N Have any new areas been added to the MS4 within the last 12 months? *~ 43 acres*
127. ☒ Y N Do they have a plan for implementing the Stormwater Management Program in all newly added areas within 90 days of transfer of responsibility? (4.4.4.)
- ✓ 128. Y ☒ N Does the plan include schedules for implementation? (4.4.4.) *okay*
129. ☒ Y N Are they implementing their Stormwater Management Program requirements in these areas? (4.4.4.)
130. ☒ Y N Has information on all new annexed areas and resulting updates been included in the annual report? (4.4.4.)

Enforcement Response Plan (4.5.)

131. ☒ Y ☐ N Have they developed an Enforcement Response Plan addressing their ability to respond to violations and describing progressive enforcement including verbal warnings, written notices, citation with penalties, stop work orders, and withholding of plan approvals or other authorizations? (4.5.1.) (Due 18 months from NOC effective date)

132. Does their enforcement case documentation include the following (4.5.3.):

☒ Y ☐ N Name of owner/operator
☒ Y ☐ N Description of violation
☒ Y ☐ N Enforcement response used
☒ Y ☐ N Referrals

☒ Y ☐ N Location
☒ Y ☐ N Compliance schedule
☒ Y ☐ N Documentation of enforcement response
☒ Y ☐ N Date the violation was resolved

133. Y ☒ N Have they developed a plan to identify chronic violators? Describe. (4.5.4.)

MS4 tracks violators

Discharges to Water Quality Impaired Waters

134. ☒ Y ☐ N Have they included/implemented BMPs specifically targeted to achieve wasteload allocations prescribed by all applicable TMDLs? (3.1.1)

135. ☒ Y ☐ N Does the SWMP include a schedule of installation and monitoring of such BMPs? (3.1.1.)

Analytical monitoring (5.1.) *Turkey only* *silt & e.coli*

136. Y ☐ N Has this program element been included in the SWMP? (3.1.1.)

137. Y ☐ N For stream segments identified as being impaired for siltation and/or habitat alteration, where discharges from the MS4 have been identified as a source of impairment, is biological stream sampling utilizing the Semi-Quantitative Single Habitat (SQSH) Method as identified in the division's Quality System Standard Operating Procedure for Macroinvertebrate Stream Survey being performed? (5.1.)

Y ☒ N Every 5 years?

138. Y ☐ N For stream segments identified as being impaired for pathogens, where discharges from the MS4 have been identified as a source of impairment, is bacteriological stream sampling utilizing methods identified in the division's Quality System Standard Operating Procedure for Chemical and Bacteriological Sampling of Surface Water being performed? (5.1.)

Y ☒ N Every 5 years?

NA

139. Y N Are they performing the TMDL prescribed analytical monitoring for all stream segments subject to a TMDL for parameters other than siltation, habitat alteration or pathogens where the MS4 has been identified as a source of impairment? (5.1.)

Non-analytical monitoring (5.2.)

140. ☒ Y N Has this program element been included in the SWMP? (3.1.1.)
141. ☒ Y N Are they performing visual stream surveys and impairment inventories upstream and downstream of each MS4 outfall discharging into an impaired stream where the discharges from the MS4 have been identified as a source of impairment? (5.2.) Ask to see their records. Describe how this is documented.
- Y N Every 5 years?

Recordkeeping (5.3)

142. ☒ Y N Are records being kept of all monitoring activities, copies of reports, and records of all data used to complete the NOI for at least 3 years? (5.3.)

Reporting (5.4.)

143. ☒ Y N Have they presented their annual reports at a public hearing for suggestions and comment prior to submitting to the division? (5.4.) List how they documented.
144. ☒ Y N Have they submitted their annual reports to the EFO by September 30th of each year that covers the previous fiscal year? (5.4.)

Wrap-Up:

145. Does the SWMP include the follow information for each of the six minimum control measures:

Best management practices (BMPs), programs and processes (SOPs) that the MS4 will implement for this minimum control measure? (4.1.a.)

- ☒ Y N Public Education and Outreach
- ☒ Y N Public Involvement/Participation
- ☒ Y N Illicit Discharge and Elimination
- ☒ Y N Construction Site Stormwater Runoff Control
- ☒ Y N Permanent Stormwater Management
- ☒ Y N Pollution Prevention/Good Housekeeping for Municipal Operations

Measurable goals and milestones that the MS4 will implement (with dates/frequencies) for each BMP? (4.1.b.)

- ☒ Y ☐ N Public Education and Outreach
- ☒ Y ☐ N Public Involvement/Participation
- ☒ Y ☐ N Illicit Discharge and Elimination
- ☒ Y ☐ N Construction Site Stormwater Runoff Control
- ☒ Y ☐ N Permanent Stormwater Management
- ☒ Y ☐ N Pollution Prevention/Good Housekeeping for Municipal Operations
- ☒ Y ☐ N The person(s) responsible for implementing/coordinating BMPs?

The person(s) responsible for implementing or coordinating the BMP? (4.1.c.)

- ☒ Y ☐ N Public Education and Outreach
- ☒ Y ☐ N Public Involvement/Participation
- ☒ Y ☐ N Illicit Discharge and Elimination
- ☒ Y ☐ N Construction Site Stormwater Runoff Control
- ☒ Y ☐ N Permanent Stormwater Management
- ☒ Y ☐ N Pollution Prevention/Good Housekeeping for Municipal Operations

Pollutant control efforts for all municipal operated facilities that maintain or store motorized equipment, oils, or other hazardous materials? (4.1.d.)

- ☒ Y ☐ N Public Education and Outreach
- ☒ Y ☐ N Public Involvement/Participation
- ☒ Y ☐ N Illicit Discharge and Elimination
- ☒ Y ☐ N Construction Site Stormwater Runoff Control
- ☒ Y ☐ N Permanent Stormwater Management
- ☒ Y ☐ N Pollution Prevention/Good Housekeeping for Municipal Operations

Are all applicable inspections and monitoring programs described in detail? (4.1.e.)

- ☒ Y ☐ N Public Education and Outreach
- ☒ Y ☐ N Public Involvement/Participation
- ☒ Y ☐ N Illicit Discharge and Elimination
- ☒ Y ☐ N Construction Site Stormwater Runoff Control
- ☒ Y ☒ N Permanent Stormwater Management
- ☒ Y ☐ N Pollution Prevention/Good Housekeeping for Municipal Operations

146. ☒ Y ☐ N Have they coordinated SWMP implementation among various agencies or units within the MS4 and with third parties responsible for SWMP implementation? Describe.

Additional Comments:

Appeals go to multiple boards *

Kenny left End of February

Ordinance consolidation recommended

Monitoring plan deficiencies: no 303d ref, ^{work key} no siltation, old sop.
↳ date / deadline

Airport needs SWPPP/ODM → inventory needed

Education PIE to Hotspots not included

LD permit close out procedures

Name/Agency of Lead Inspector:	Signature of Lead Inspector:
Names/Agencies of Other Inspectors:	

* This worksheet applies to MS4s that have been previously permitted.